



FLETCHER CONSTRUCTION
NORTH AMERICA

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**Environmental
Cleanup Office**

July 28, 2008

Ms. Kristine Koch
Remedial Project Manager
United States Environmental Protection Agency, Region 10
Office of Environmental Cleanup, Mail Code ECL-115
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

Re: Fletcher Construction Company North America's Response to
EPA's June 25, 2008 Request for Information Regarding
Portland Harbor Superfund Site, Portland, Oregon

Dear Ms. Koch:

On behalf of Fletcher Construction Company North America ("Fletcher"), this letter acknowledges and responds to the letter dated June 25, 2008 from Deb Yamamoto, Unit Manager, Site Cleanup #2, Office of Environmental Cleanup. As a preliminary matter, please note Fletcher filed its Certificate of Dissolution on June 26, 2007 (see attached). Fletcher is winding down all corporate activity and has no employees. Nor does it have a physical corporate office.

I am replying to this request in my capacity as an officer named in the notice of dissolution. Please note I have no personal knowledge of Fletcher's involvement with the Investigation Area. These responses are based on my efforts to contact Fletcher's last officers and directors and my review of the available corporate records. Fletcher reserves the right to supplement these answers should other information or documents become available.

Regarding questions 1-3, Fletcher is a Delaware corporation with no remaining corporate office. Its mailing address is P.O. Box 2353, Issaquah, WA 98027.

Regarding questions 4-5, 7, 10-11, 13(a), and 20, my search revealed a former lease to Wright Schuchart, Inc. from McEachern Corp. that may involve a property located in the Investigation Area. This lease is attached. I have not discovered anyone with first-hand knowledge regarding this document or the activities that occurred on the property.

Regarding question 73, Fletcher does not plan nor have the resources to conduct "any investigations of the soil, water (ground or surface), geology, hydrology, and/or air quality on or about the Property."

Regarding questions 74-77, any responsive documents in Fletcher's possession are attached. Briefly, Wright Schuchart, Inc. was incorporated on May

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27, 1976. On March 1, 1993, it changed its name to Fletcher General, Inc. On March 23, 2001, Fletcher General, Inc., was merged into Fletcher Construction Company North America, a Delaware corporation.

With respect to ownership of the lessee, Wright Schuchart, Inc., Sprague Resources Corporation's 50,000 shares of Wright Schuchart, Inc. were sold to Fletcher Schuchart Helsell Limited on October 6, 1987. In June 1988, Fletcher Schuchart Helsell Limited resolved to change its name to Fletcher Construction Company (Delaware) Limited. On December 31, 1997, Fletcher Construction Company (Delaware) Limited resolved to transfer all of its shares of Fletcher General, Inc. (formerly known as Wright Schuchart, Inc.) to its parent company, Fletcher Construction Company North America, as a dividend. As mentioned above, Fletcher General, Inc. merged into Fletcher Construction Company North America in 2001.

With respect to the officers and directors of Wright Schuchart, Inc. during the time of the lease, the minutes suggest the officers during the period of the lease were George S. Schuchart; Robert M. Hellsell; C. Larry Walker; Richard E. Johnson; Daniel A. McDougall; Paul C. Myhre; James E. Orgill; Thomas R. Anderson; Dale Joebgen; Wilfred H. Epping; and Richard E. Bangert. The directors were George Schuchart; Howard S. Wright; Daniel L. Ruthford; Robert M. Hellsell; C. Larry Walker; Howard S. Wright, Jr.; George S. Schuchart, Jr.; and Thomas B. Foster. None of these individuals have been involved with the company for at least two decades. The only address I have is for George S. Schuchart, Jr. at (b) (6) Seattle WA 98112-3722.

Regarding questions 79, 81-82, I submitted the EPA's request for information to Fletcher's last officers/directors, Ron Johnson, Carl Munkowits, and Mark Binns, and asked them to review and offer appropriate answers. Based on my review, I have attached several documents that touch upon the area of inquiry.

With regard to the remaining questions, I have not found any other first-hand information or documentation responsive to your inquiries and, at this time, I am unable to provide any further assistance in your efforts.

I trust this satisfactorily answers your inquiry. As requested, I declare under penalty of perjury that I am authorized to respond on behalf of Fletcher and that the foregoing is complete, true, and correct to the best of my knowledge.

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If you have any additional questions, please do not hesitate to contact the undersigned.

Very truly yours,

Fletcher Construction Company North America

A handwritten signature in blue ink, appearing to read "Ronald A. Johnson", is written over the printed name.

By Ronald A. Johnson
Its Vice-President/Secretary/Treasurer Named
in the Certificate of Dissolution

Attachments